1 Paul J. Cambria, Jr. (NY 15873, admitted pro hac vice) 2 Erin E. McCampbell (NY 4480166, admitted pro hac vice) LIPSITZ GREEN SCIME CAMBRIA LLP 3 42 Delaware Avenue, Suite 120 Buffalo, New York 14202 4 Telephone: (716) 849-1333 Facsimile: (716) 855-1580 5 pcambria@lglaw.com 6 Attorneys for Defendant Michael Lacey 7 IN THE UNITED STATES DISTRICT COURT 8 FOR THE DISTRICT OF ARIZONA 9 United States of America, 10 NO. CR-18-00422-PHX-SMB 11 Plaintiff, **DEFENDANT MICHAEL LACEY'S** MOTION TO SET HEARING ON VS. 12 **MOTION TO AMEND HIS** 13 **CONDITIONS OF PRETRIAL** Michael Lacey, et al., RELEASE AND MOTION FOR 14 Defendants. EXPEDITED RELIEF 15 (Expedited oral argument requested) 16 17 Excludable delay under 18 U.S.C. § 3161(h)(1) may occur as a result of this motion or an 18 order based thereon, as explained more fully below. 19 Defendant Michael Lacey, by and through his undersigned counsel, hereby respectfully 20 requests that this Court set a hearing on his Motion to Amend his Conditions of Pretrial Release 21 ("Motion") (Doc. 503), which was filed on March 19, 2019. The government's Response was filed 22 on April 2, 2019 (Doc. 516), and Mr. Lacey's reply in further support of his Motion was filed on 23 April 16, 2019 (Doc. 522). Thus, the matters raised in the Motion are fully briefed and ripe for 24 decision. 25 Mr. Lacey respectfully request that this Court set the hearing on the Motion for April 23, 26 2019, the same date as the upcoming status conference, due to the fact that Mr. Lacey's counsel will 27

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be traveling from Buffalo, New York to this District for the status conference. In order to avoid duplicative travel costs, Mr. Lacey would greatly appreciate the hearing on his Motion to be scheduled for the same date as the status conference. RESPECTFULLY SUBMITTED this 16th day of April, 2019, /s/ Paul J. Cambria, Jr. LIPSITZ GREEN SCIME CAMBRIA LLP Attorneys for Defendant Michael Lacey 

| .       |                                                                            |
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